IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA

: Case No. 3:22-cv-1Z

KENNETH ROBERT GODSEY, Defendant

v.

: Violations: 18 U.S.C. § 876(c)

CLERK'S OFFICE U.S. DIST. COURT AT CHARLOTTESVILLE, VA

INDICTMENT

COUNT ONE

AUG 1 0 2022

The Grand Jury charges that:

1. On or about June 7, 2021, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney KLJ, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.

2. All in violation of Title 18, United States Code, Section 876(c).

COUNT TWO

The Grand Jury charges that:

1. On or about June 10, 2021, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney KLJ, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.

2. All in violation of Title 18, United States Code, Section 876(c).

COUNT THREE

The Grand Jury charges that:

- 1. On or about June 18, 2021, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney KLJ, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT FOUR

- 1. On or about October 27, 2021, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney JRB, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT FIVE

The Grand Jury charges that:

- 1. On or about November 4, 2021, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney JRB, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT SIX

- 1. On or about November 12, 2021, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney ZTL, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT SEVEN

The Grand Jury charges that:

- 1. On or about March 8, 2022, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney KLJ, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT EIGHT

- 1. On or about March 18, 2022, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney KLJ, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT NINE

The Grand Jury charges that:

- 1. On or about May 26, 2022, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorneys KLJ and JRB, Federal law enforcement officers, and officials covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT TEN

- 1. On or about May 26, 2022, in the Western District of Virginia and elsewhere, the defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Assistant United States Attorney SB, a Federal law enforcement officer, and an official covered by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of the addressee or of another.
 - 2. All in violation of Title 18, United States Code, Section 876(c).

COUNT ELEVEN

The Grand Jury charges that:

1. On or about June 7, 2022, in the Western District of Virginia and elsewhere, the

defendant, KENNETH ROBERT GODSEY, knowingly deposited in any post office or authorized

depository for mail matter, to be sent or delivered by the Postal Service and knowingly caused to

be delivered by the Postal Service according to the direction thereon, a communication addressed

to Assistant United States Attorney JRB, a Federal law enforcement officer, and an official covered

by Title 18, United States Code, Section 1114, containing a threat to kill and injure the person of

the addressee or of another.

2. All in violation of Title 18, United States Code, Section 876(c).

A TRUE BILL, this 10TH day of August 2022.

JGRAND JURY FOREPERSON
Jury Foreperson

CHRISTOPHER KAVANAUGH United States Attorney

By:

Angela Mastandrea-Miller

Special Assistant United States Attorney

Acting Under Authority Conferred by 28 U.S.C. § 515